

Mao Declaration Exhibit A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Richard Seeborg, Judge

| | | |
|---------------------------|---|-----------------------------|
| ANIBAL RODRIGUEZ, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | No. 3:20-cv-04688-RS |
| |) | |
| GOOGLE LLC, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

San Francisco, California

Wednesday, July 30, 2025

TRANSCRIPT OF PROCEEDINGS

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(Appearances continued on the following page)

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1 of silly doing that" --

2 **THE COURT:** That's the first one. You're reading my
3 mind.

4 **MR. SANTACANA:** But --

5 **THE COURT:** That's true, and the other reason -- you
6 know, the thing that I think -- the reason I ruled in your
7 favor on that is that I think if, you know, a witness, an
8 expert who will be designated as an expert has all the, you
9 know, stature of that on the stand is a very different
10 proposition than a lawyer, and, you know, not only is there the
11 you look bad concept, but I suspect you will get up and argue
12 and say, you know, they're just making -- they're asking you to
13 give them the moon and the stars, and it's offensive and
14 whatever else you want to say.

15 I'm just -- I'm sort of loathe to constrain the lawyer
16 argument. I agree with you that -- and I think it's different
17 -- a lawyer can't make up facts and can't mislead the jury on
18 the laws and that kind of thing, but that's not what's going on
19 here.

20 What's going on here is a lawyer saying your experts say,
21 you know, calculate out to 500 million, and he told you how he
22 did it. We think you should take that, and you should, you
23 know, award much more.

24 It's not new facts. It's just an argument. But I hear
25 you, and I haven't decided the question. I'll think about it.

1 **MR. HUR:** Thank you, Your Honor.

2 It sounds like there is a dispute about something that our
3 expert said in that report. I think, Your Honor, we should
4 meet and confer. We have some concerns about what their expert
5 said. So I think we should meet and confer, and if we need a
6 motion, we can agree --

7 **THE COURT:** Okay. If you are going to file -- if the
8 meet and confer fails to resolve these questions, I want you to
9 file any motions that are going to pertain to supplementing the
10 expert reports on either side promptly. So I would want -- if
11 you're going to -- if this isn't going to resolve in some other
12 way, then I want the motion by early next week because time is
13 fleeting, and I want to get as much done as we can get done in
14 advance.

15 So plan to file it, say, by Tuesday of next week if you're
16 going to have, you know, a dispute with respect to either
17 side's supplemental expert documents. And the only other, as
18 I'm trying to think back on what we talked about today is going
19 to be -- what was the other motion that I'm anticipating?

20 **MR. HUR:** We were going to file a motion in limine --

21 **THE COURT:** Well, one is to -- with respect to Mr. --
22 whatever his name is, your representative.

23 **MR. BOIES:** Cataldo.

24 **MR. HUR:** Cataldo.

25 **THE COURT:** Yeah. So that's going to be a motion.

1 And then supplemental expert. Anything else that I'm --

2 **MR. HUR:** I thought there was one motion.

3 **MR. SANTACANA:** And a motion in limine, Your Honor,
4 that you invited earlier today.

5 **THE COURT:** And remind me what it's about.

6 **MR. SANTACANA:** I need to remind myself.

7 Your Honor, this is about multiplying the damages by 98
8 months.

9 **THE COURT:** Oh, yes. Okay. I'm going to get a motion
10 on that, that's right.

11 **MR. SANTACANA:** Yes.

12 **THE COURT:** And then as I said -- I said this, but
13 I'll repeat it. There is a subpoena. This goes to number 6,
14 and I will deal with the motion to quash and the motion in
15 limine together, and you'll get an order on that issue. Okay.

16 And as Karen reminds me, I think everybody agrees with
17 this, witnesses are excluded until -- yeah, that's way we
18 operate. Okay?

19 So I will be giving you written orders on the motions in
20 limine, and I will then rule on these additional items that you
21 submit, but otherwise, I think we're just ready to go, I think.

22 Any settlement discussions going on? I just want to know.
23 I don't want to know anything about them. I just want to know
24 if they're going on.

25 **MR. BOIES:** We have had them, Your Honor, and I think

CERTIFICATE OF REPORTER

I certify that the foregoing is a correct transcript from
the record of proceedings in the above-entitled matter.

DATE: Saturday, August 2, 2025



April Wood Brott, CSR No. 13782